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Attorneys for: Material Witness PEDRO NIETO-ROJAS

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

Criminal Case No. 08 cr 2429-WQH
Mag. Docket No. 08 mj 2098

Plaintiff,

V.

ODILON CIRA-RAMIREZ,

**APPLICATION FOR AN ORDER
SHORTENING TIME TO HEAR
MATERIAL WITNESS PEDRO NIETO-
ROJAS'S MOTION FOR VIDEO
DEPOSITION AND RELEASE**

JUDGE: Hon. William McCurine, Jr.
CRTRM: "C", First floor

DATE: August 14, 2008
TIME: 9:30 a.m.

Defendant.

UNITED STATES OF AMERICA,

Criminal Case No. 08 cr 2430-BTM
Mag. Docket No. 08 mj 2098

Plaintiff.

V.

GERARDO SALTO-ROCHA (1),

JOSE HERNANDEZ-RIVAS (2),

Defendants

PEDRO NIETO-ROJAS (“NIETO”) hereby applies for an Order Shortening Time in which to hear his Motion for Video Deposition and Release. The Memorandum of Points and Authorities in support of the Motion, filed herewith, demonstrates the hearing of the Motion on

1 shortened time is necessary; specifically, that NIETO has been incarcerated since July 8, 2008
2 and has no hope of obtaining a surety to post his bond.

3 Dated: August 1, 2008

Mayfield & Associates

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5 By: /s/ Gayle Mayfield-Venieris
6 Gayle Mayfield-Venieris, Esq.
7 Attorney for Material Witness
8 PEDRO NIETO-ROJAS
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**UNITED STATES DISTRICT COURT
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1 Plaintiff.

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**PROOF OF SERVICE VIA E-FILE
[Fed. R. Civ. Pro. 4, Local Rule 5]**

3 | ODILON CIRA-RAMIREZ.

15 | Defendant.

16

17 | UNITED STATES OF AMERICA,

Criminal Case No. 08 cr 2430-BTM
Mag. Docket No. 08 mj 2098

18 Plaintiff

19

20 GERARDO SALTO-ROCHA (1),

21 | JOSE HERNANDEZ-RIVAS (2),

22 Defendants

I, Christopher Lock, declare as follows:

26 1. I am over eighteen years of age and not a party to the above-referenced action; my
27 business address is 462 Stevens Avenue, Suite 303, Solana Beach, CA 92075-2066. I am
28 employed in San Diego County, California. **1 of 2**

2. On August 1, 2008, I filed the aforementioned document on the Court's CM/ECF system in Case No. 08 mj 2098/08 cr 2429-WQH/08 cr 2430-BTM. The following counsel were electronically served with the aforementioned document via the CM/ECF system pursuant to Local Rule 5.4(c):

- **Motion to Shorten Time**
- **Notice of Motion and Motion to take deposition by Video**
- **Points and Authorities in Support of Motion for Video Deposition**

Peter Mazza, A.U.S.A

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Andrew Lah, Esq.

dlbakerlaw@aol.com

Andrew lah@fd.org

I declare under penalty of perjury under the laws of the United States, State of California
that the foregoing is true and correct and that this declaration was executed on August 1, 2008.

~~Christopher Lock~~
Mayfield & Associates